

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

Paul Laidig, Peter Lewis, and Derek Kemp, as  
representatives of a class of similarly situated  
persons, and on behalf of the Vi-Jon Employee  
Stock Ownership Plan,

Plaintiffs,

v.

GreatBanc Trust Company, et al.,

Defendants.

Case No. 1:22-cv-01296

Hon. LaShonda A. Hunt

Hon. Heather K. McShain

**PLAINTIFFS' UNOPPOSED  
MOTION FOR FINAL APPROVAL  
OF PARTIAL CLASS ACTION  
SETTLEMENT**

**TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

Plaintiffs Paul David Laidig, Peter Lewis, and Derek Kemp (“Plaintiffs”) respectfully move the Court for an Order granting final approval of the Partial Class Action Settlement Agreement (Dkt. 258-1), as amended (Dkt. 302-1).

This unopposed motion is made pursuant to Federal Rule of Civil Procedure 23(e), this Court’s Preliminary Approval Order dated May 13, 2025 (Dkt. 311), and Paragraph 2.4 of the Class Action Settlement Agreement, and is based on the accompanying Memorandum of Law and authorities cited therein, the Declaration of Brock J. Specht and exhibits attached thereto, the Declaration of Bryn Bridley and exhibits attached thereto, and all files, records, and proceedings in this matter. A proposed Final Approval Order is being submitted in connection with this motion.

Dated: July 29, 2025

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s/Brock J. Specht

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 29, 2025, I caused a copy of the foregoing to be electronically filed with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

Dated: July 29, 2025

s/Brock J. Specht  
Brock J. Specht